

EXHIBIT C



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PLEASE RESPOND TO: LONG BEACH

June 1, 2016

JAN'S PACKAGING, INC.
c/o John B. Larson, Esq.
LARSON & GASTON, LLP
200 S. Los Robles Ave., Ste. 530
Pasadena, CA 91101

Via Email: John.Larson@LarsonGaston.com

Re: Notice of Claim and document request
Kingpoint Technology/KVT/Silan/Itochu - Jan's Packaging
Jan's Pro #s: 121375 p/u 10/05/15, 121427 p/u 10/9/15
and 121441 p/u 10/12/15
Your Ref: tba
Our Ref: 3362

Dear Mr. Larson:

As you know, we represent Tokio Marine & Nichido Fire, liability insurer for Itochu Logistics. Thank you, Jan's Packaging and its insurer for attempted early intervention in connection with the captioned shipments which were damaged between tender at Intel Corporation in Hudson, Massachusetts and delivery to Jan Packaging in Dover, New Jersey.

We nevertheless place Jan's Packaging on formal notice of claim for all losses and claims associated with the referenced shipments. The claim and demand amount is \$786,298. It is possible the claim amount may change following cargo delivery to the consignee in China and damage assessment which may require delivery and setup of the entire system to determine functionality of the cargo. As already advised, the representative/consultant for Jan's Packaging is invited to participate in the damage evaluation process. Please advise who is nominated as the U.S. and China points of contact on behalf of Jan's Packaging for notice of inspections.

Meanwhile, if Jan's Packaging believes other entities were responsible for any of the damages, then it is requested that Jan's provide formal notice of claim on each of those entities. For our part, we request a copy of such notices of claim, as well as all documentation surrounding the retention, contracting, transportation, billing and all communications involving Jan's Packaging and such third parties, including Nolan Transport Services, McCollister's Transportation Group and Bala.

For our part, attached is a without prejudice copy of the EMIC preliminary survey report and Werlinger & Associates preliminary Inspection.

CAMMARANO LAW GROUP

June 1, 2016
John B. Larson, Esq.
Re: Damage to IC/wafer fabrication tools
Page 2

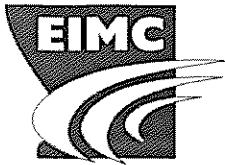
This notice of claim is designed to preserve rights and is without prejudice. Know we remain desirous of continued cooperation in mitigating the consequences of this unfortunate situation. Thank you.

Very truly yours,

Cammarano Law Group

s/
Dennis A. Cammarano

Enclosures, as above
3362larson060116



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PRELIMINARY SURVEY REPORT

November 9, 2015

Your Ref.	: Insured: Itochu Logistics	Our Ref.	: 15-022449
Date of Assignment	: Oct 19, 2015	Inspected by	: Michael Soler, EIMC surveyor
Date of Survey	: Oct 20, 2015	Place of Survey	: JAN Packaging Dover, NJ
Consignment	: Used machinery		
Shipper	: Intel Corp. Hudson, MA	Consignee	: Itochu c/o Jan Packaging Dover, NJ

Further to the request of TM claims service, we did attend survey of above shipment.

BACKGROUND:

The shipper (Intel Corporation) manufactures computer chips & circuits. The Intel Corporation manufacturing plant located in Hudson, MA is closing down and moving its operations to China. The computer manufacturing machinery was picked up from Intel Corporation in Hudson, MA by Jan Packaging & Nolan Transport Services. All machinery delivered to Jan Packaging warehouse in Dover, NJ for export packaging and stuffing into the ocean containers. This is an on-going project, reportedly all machinery has to be removed from the factory by May 31, 2016.

SURVEYORS FINDINGS:

On October 20, 2015, at 09:00hrs, we attended as requested at Jan Packaging, 100 Harrison Street in Dover, NJ to inspect the overall conditions of the machinery. During the inspection we met with Mr. Asuka Meiki, ITOCHU Logistics operation manager and learned the following details; ITOCHU Logistic Corp is organizing the export packaging and stuffing operations of this project. All machinery picked up from Intel Corp. and delivered to Jan Packaging for crating and loading into the ocean containers for export to China. Machinery delivered to Jan Packaging inside of enclosed trailers. Jan Packaging was unable to provide us with information on the securement & stowage conditions of the machinery inside of the trailers.

Reportedly, as per the Jan Packaging representative, upon delivery to Jan Packaging there were no apparent damages noted to the machinery. The damages to the machinery were first discovered once the bubble wrapping was removed by the receiving personnel. At the time of our inspection a total of (3) truck loads were found containing damaged units; (2) of the truck loads picked up and delivered by Jan Packaging Trucking and (1) truck load picked up and delivered by Nolan Transportation Group. According to Jan Packaging, a majority of the damaged machinery was from the Nolan Transportation Group load.

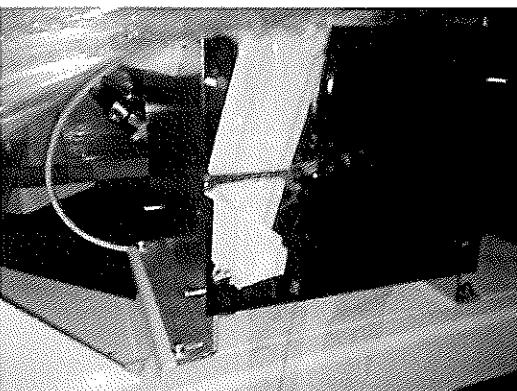
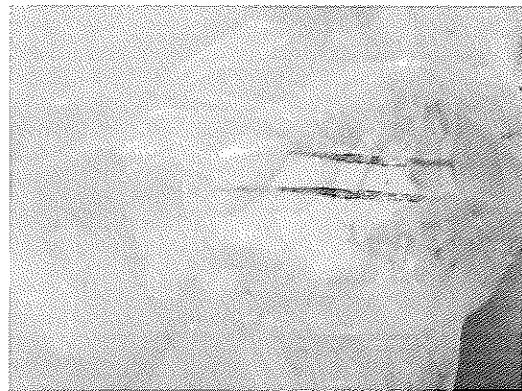
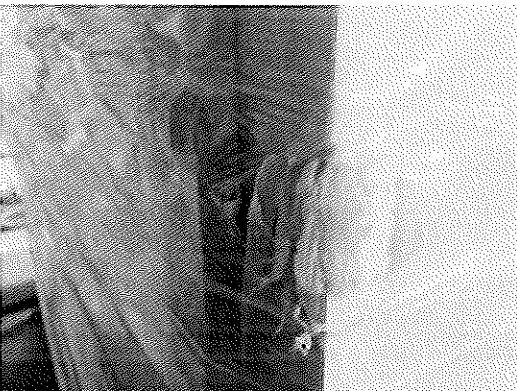
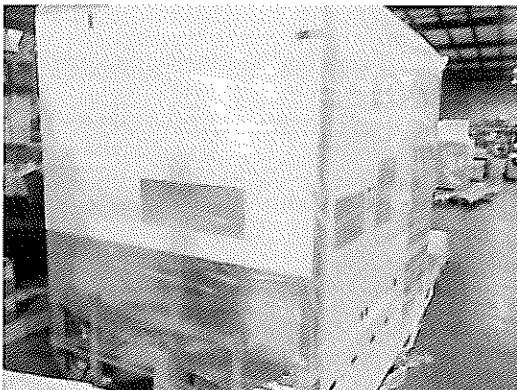
- Jan Trucking PRO# 121375 / Transport Co.: Jan Trucking / Pick-up date: Oct 05, 2015
- Jan Trucking PRO# 121427 / Transport Co.: Nolan Transportation Group / Pick-up date: Oct 09, 2015
- Jan Trucking PRO# 121441 / Transport Co.: Jan Trucking / Pick-up date: Oct 12, 2015



The cargo consisted of used machinery from Intel Corporation manufacturing plant which being exported to China. All machinery wrapped with a layer of clear plastic stretch wrap and anti-static pink bubble wrap. Similar packaging method used throughout the shipment. A majority of the machines found to be fitted with caster wheels. The damages to the machinery ranged from light to heavy physical damages and the degree of damages varied from unit to unit. During our inspection, we found the following conditions;

Damaged machinery discovered from the Jan Trucking trailer / pick-up date: Oct 05th:

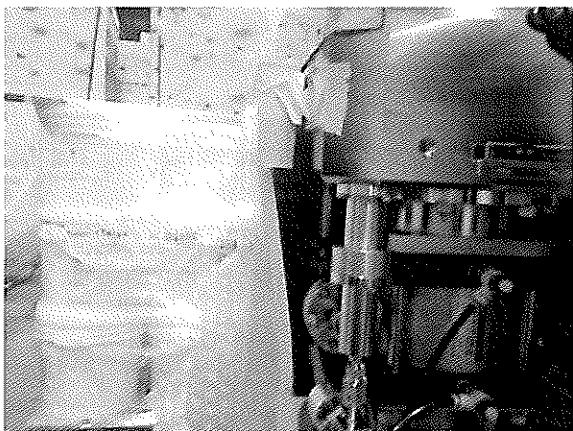
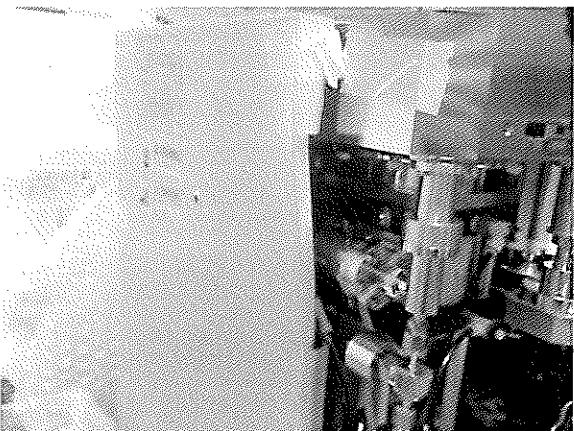
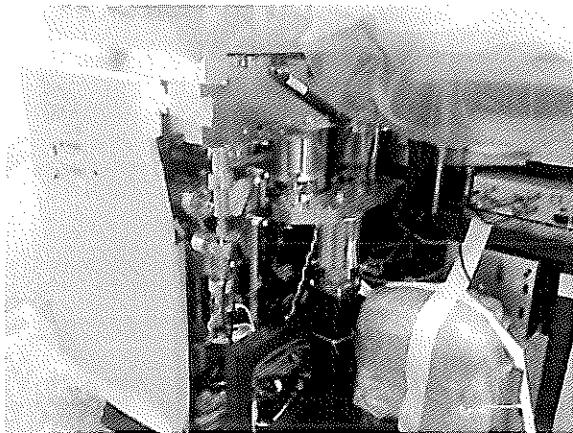
Package no's 8-1 & 8-2, description: Anneal Chamber & Main frame. Both units found wrapped with clear plastic stretch wrap, no bubble wrapping used. The side panels on both of the machines found scratched. The stretch wrap found torn with chafing damages in the area of the damages. Similar type damages sustained to both machines.





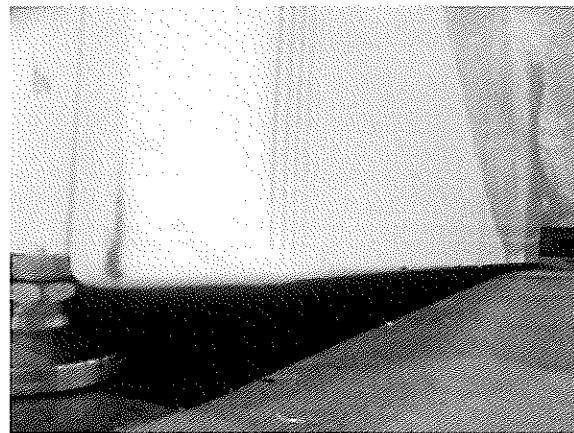
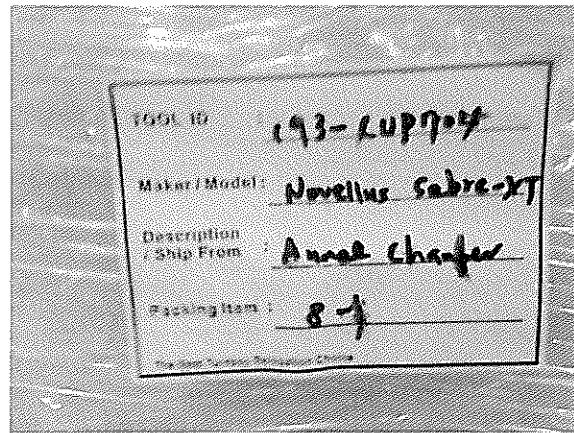
Damaged machinery discovered from the Nolan Transportation Group trailer / pick-up date: Oct 09th:

Package# 5-1, description: Main body. The unit wrapped with stretch wrap and bubble wrap. The machine side metal panel found dented inward.



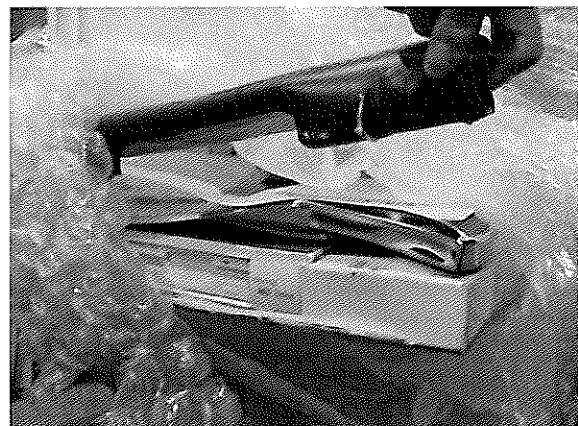
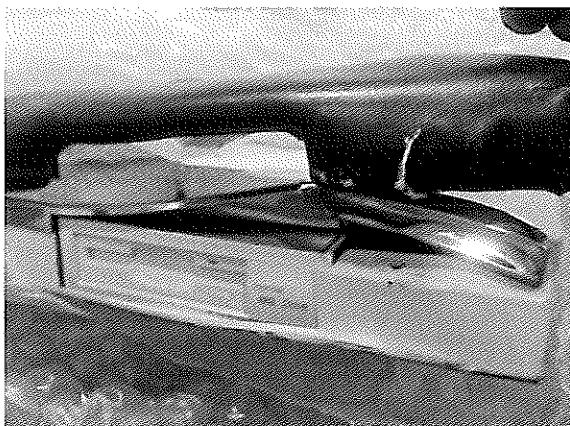
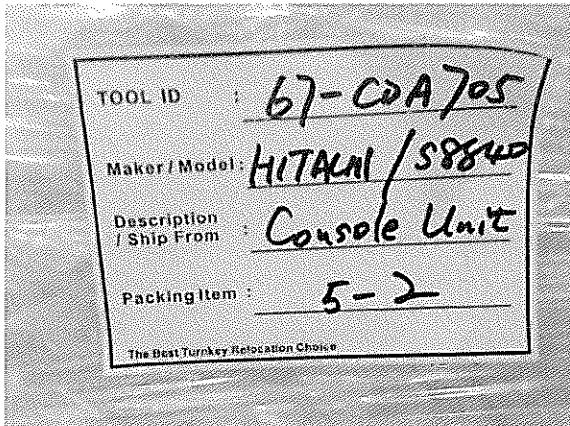


Package# 8-1, description: Anneal Chamber. The unit wrapped with a layer of clear stretch wrap and bubble wrap. The metal side panel found to be heavily dented & scratched. The front panel corners & edges found to be dented and scratched. Front panel dislodged from machine. The plastic & bubble wrapping found with chafing damages and torn in the area of the damages.

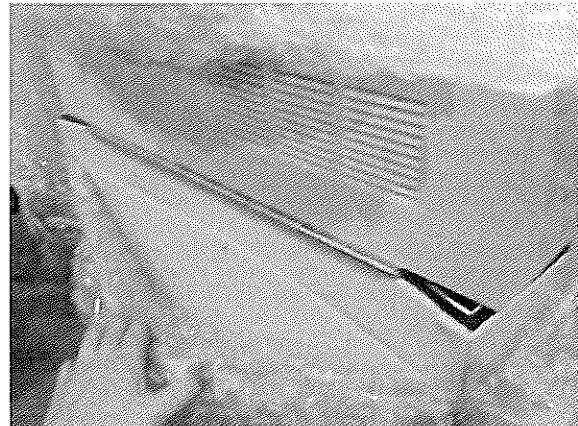
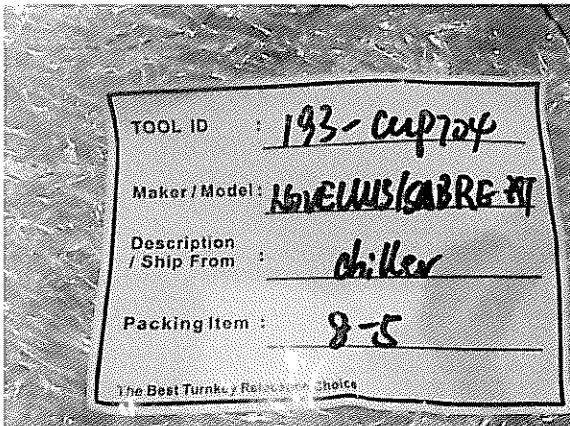




Package# 5-2, description: Console unit. The corner of the control tray on the machine found dented & distorted. The bubble & stretch wrap found torn with chafing in the area of the damages.

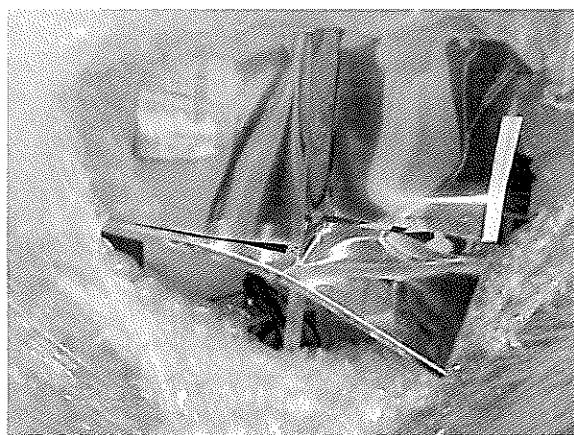
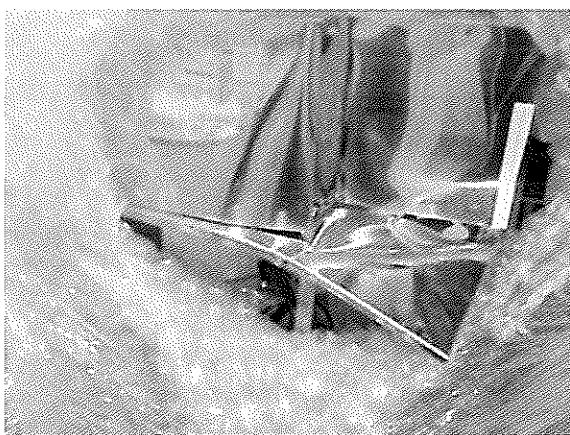
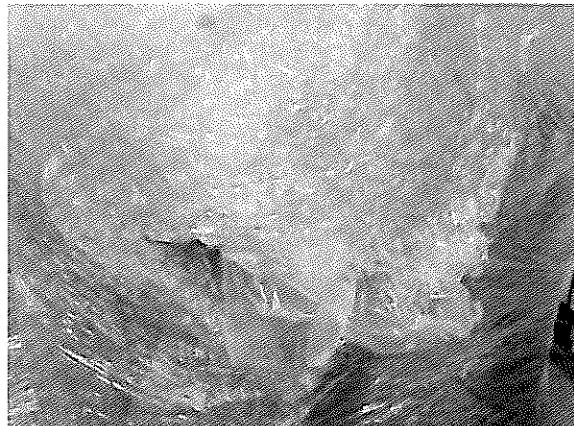
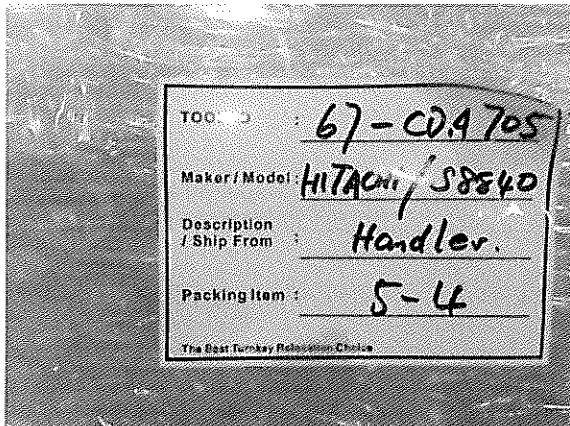


Package# 8-5, description: Chiller. Machine wrapped with a layer of stretch and bubble wrap. The backside of the machine found dented inward and off-alignment.



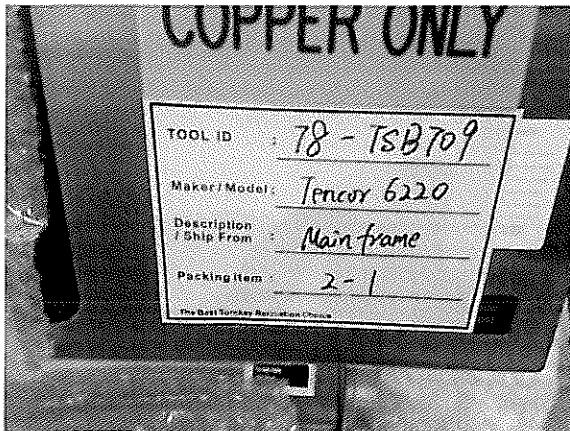


Package# 5-4, description: handler. The machine wrapped with a layer of stretch wrap & bubble wrap. We noted signs of chafing damages and torn packaging material in the area of the damages. The thin metal sheeting and covers on the machine found heavily bent & distorted.





Package# 2-1, description: Main frame. The front of the machine found to be heavily crushed and pushed inward.

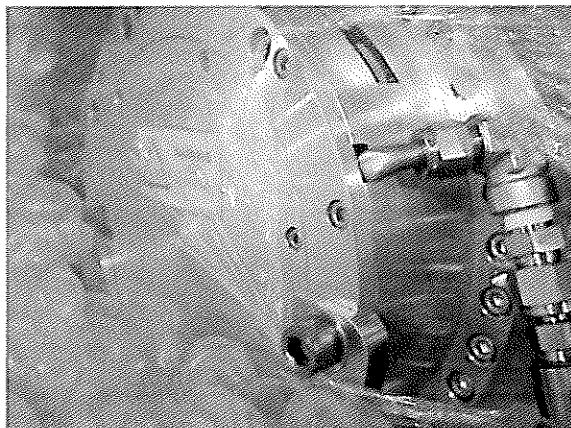
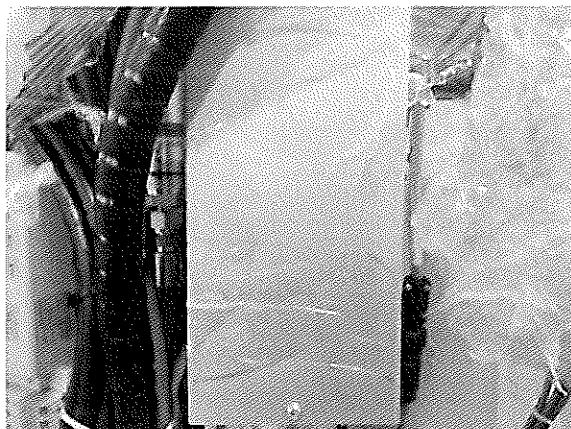
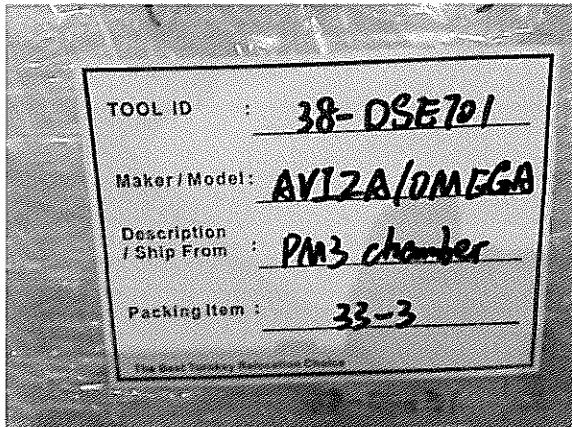


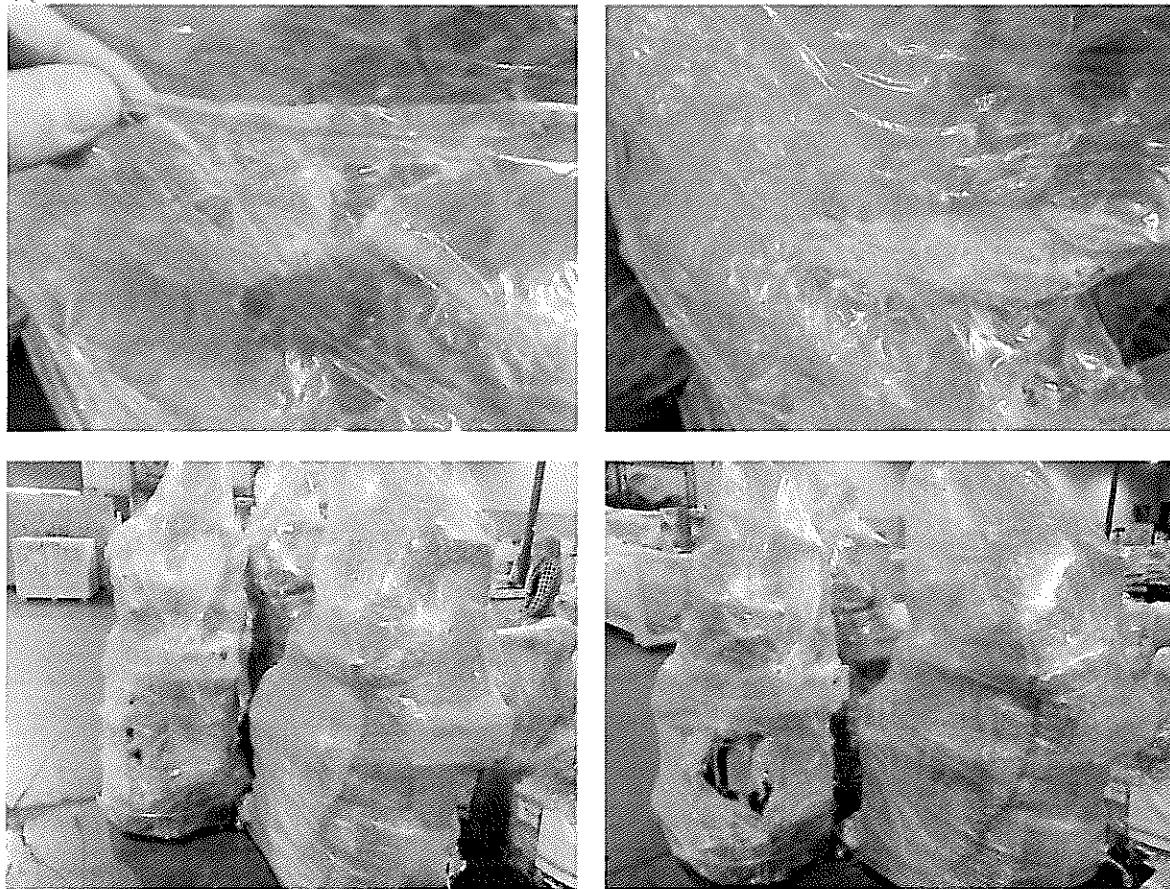


Damaged machinery discovered from the Jan Trucking trailer / pick-up date: Oct 12:

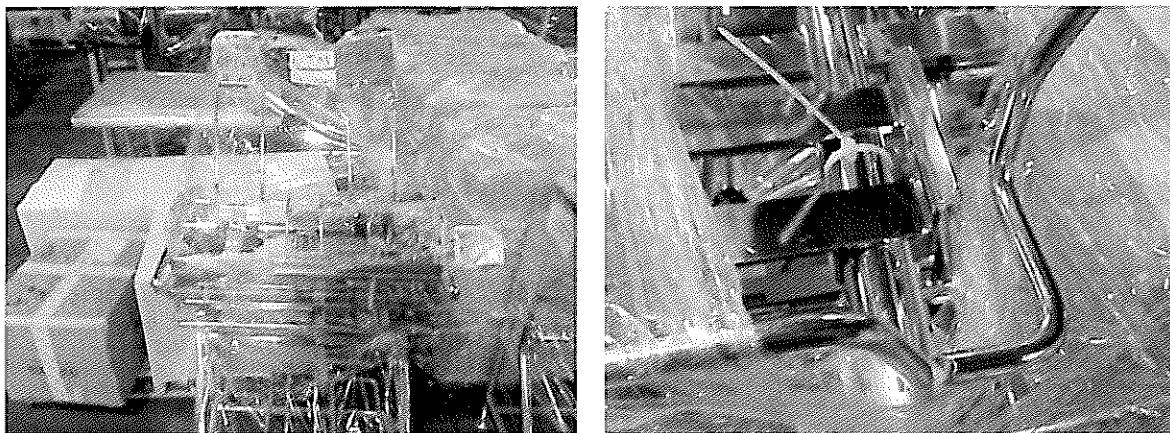
Package# 33-3, description: PM3 chamber. The machine wrapped with a layer of stretch wrap & bubble wrap. We noted signs of chafing damages to the packaging material in the area of the damages.

- The assembly box panel found dented and scratched
- Plexi-glass panel cracked
- Cable fitting bent



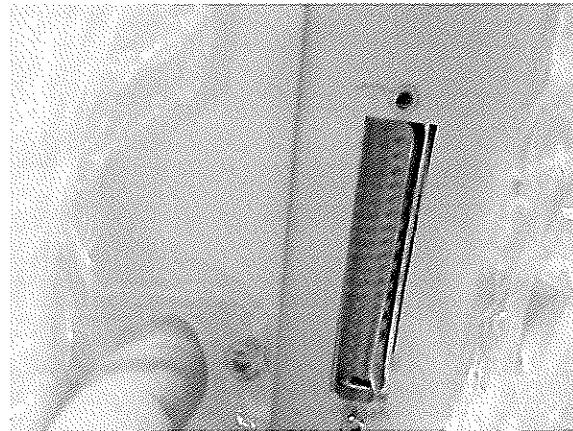
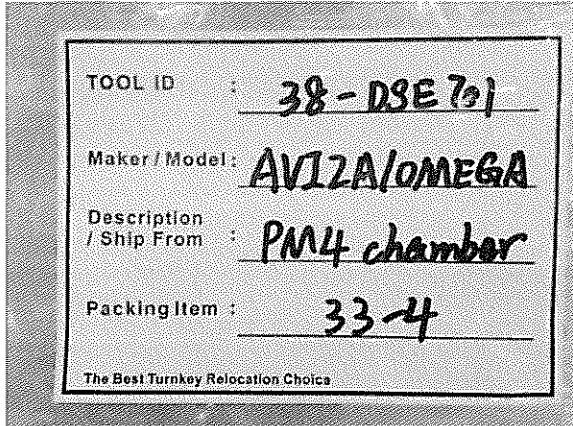


Package no. 4-2, description: Cassette table. The metal rack / cassette table found wrapped with clear stretch wrap, no bubble wrap used. A piece of the metal framing found broken off and separated from the table section.





Package no. 33-4, description: PM4 chamber. The machine found wrapped with clear stretch wrap and pink bubble wrap. The plastic & bubble wrapping found with chafing damages and torn in the area of the damages. The (2) connector ports on the backside of the machine found to be bent and distorted.



PACKING:

The machinery packaged with clear plastic stretch wrap and anti-static pink bubble wrap. No wooden crating noted. No handling markings labeled on the packaging.

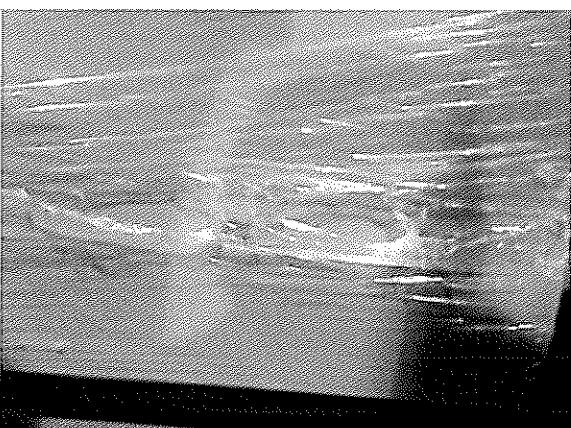
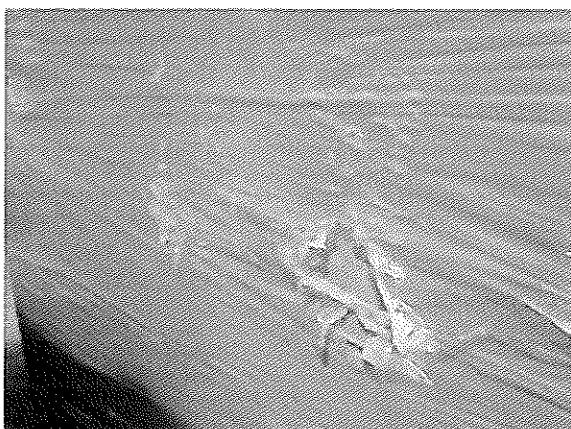
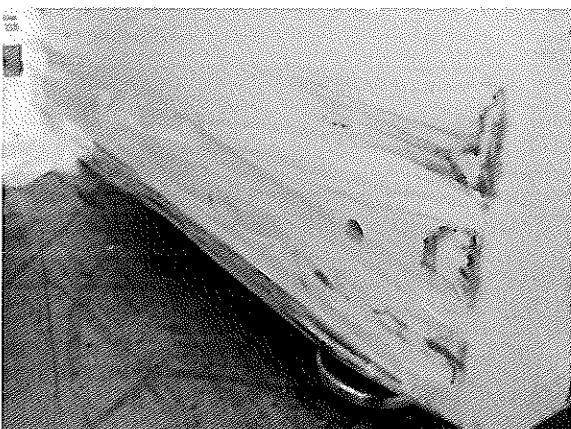
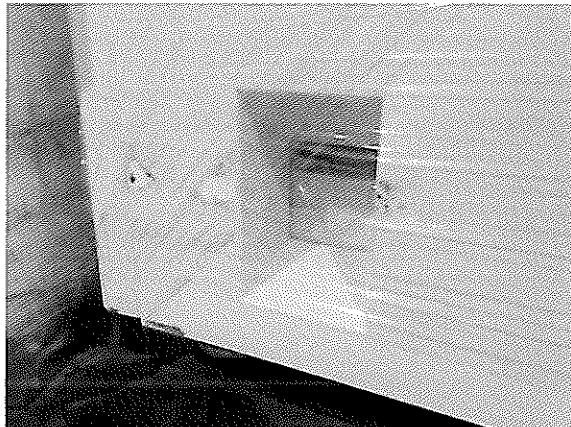
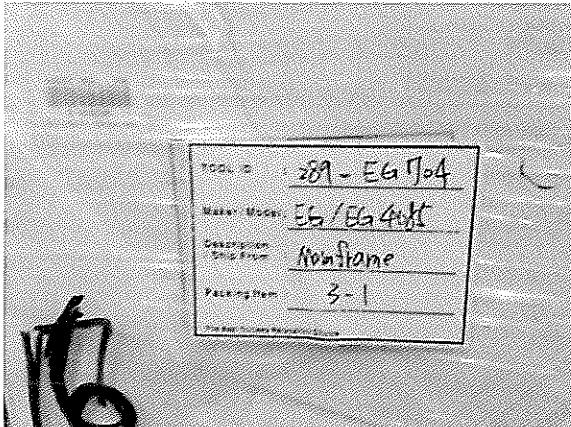
NATURE/CAUSE OF LOSS:

In our opinion the cause of loss is due to improper packaging of the machines and inadequate securement of the machines inside of the trailers. The machinery is not properly packaged for over the road transportation, the individual machines should be palletized, wrapped with multiple layers of bubble wrap, and secured to the pallets with banding straps. Each individual machine should be covered with moving pads & blankets, secured inside the trailers with straps & load bars. Void space fillers placed in the trailers to prevent cargo movement during transit.



ADDITIONAL COMMENT:

Other machinery found damaged on-site from the factory. A majority of the machine only wrapped with stretch wrap, no bubble wrap. The damages ranged from light to moderate scratches on the machines metal paneling. Clear signs of scuff marks, dirt, and torn stretch wrapping noted on the machines.





This report is based on the facts presently known to us and is submitted without prejudice to the rights of whom it may concern. All our findings and comments are subject to the underlying insurance policy conditions and/or provisions of the law. The right to amend or supplement this report at any time is reserved.

Limited Liability

It is expressly understood that all our services are rendered solely on behalf of the person or entity requesting same. Under no circumstances shall EIMC be neither liable for any indirect or consequential losses, howsoever arising, nor to any person or entity other than the person or entity requesting such services.

It is expressly understood and agreed that in any event, the liability of EIMC's and of its employees, officers, or subcontractors is limited to the fee charged for all services rendered to subject assignment, but no to exceed \$1000.00. Any claim against EIMC shall be submitted to commercial arbitration in accordance with the rules of the American Arbitration Association of New York and has to be submitted within 60 days of date of survey report or be time barred. The laws of the State of New Jersey shall govern all disputes and claims arising from the services of EIMC under this agreement.

Very truly yours,
EIMC

Melissa Yeubanks

A handwritten signature in black ink that appears to read "Melissa Yeubanks".

2015.11.09

08:38:31 -06'00'

Werlinger & Associates, Inc.

EQUIPMENT LOSS CONSULTANTS

Werlinger & Associates Informal Memorandum Itochu Logistics: Transit / Impact (D.O.L.: TBD)

Date: 20 February 2016

To: Mr. James Interrante – Tokio Marine

From: Chris Antinora – Werlinger & Associates, Inc.

RE: ***Itochu Logistics***
Claim No.: LA716-0004
W&A File No.: 6037-ITOC

This informal memorandum summarizes our preliminary findings resulting from our February 16, 2016 site visit inspection at the Jan Packaging facility located at 100 Harrison Street, Dover, NJ 07801. Our primary contact for the Insured was Mr. Yuto Haraguchi, Strategic Account General Manager.

BACKGROUND / INCIDENT

According to Mr. Haraguchi, his company is overseeing the shipping of a multitude of integrated circuit / wafer fabrication tools from the seller (Intel Corporation) located in Hudson MA to the buyer (Silan) located in China. Our Insured was reportedly hired by KPT (a transportation company in China), who was actually the company hired by Silan to oversee the shipment of the tools from the United States to China.

We were advised that the damage to the tools occurred during two separate occasions. Two of the tools, both of which are Tokyo Electron LTD US-855DD Wafer Oxide Etchers, were trucked from Hudson MA (Intel) to Courier Systems located in Newark NJ. The Insured hired McCollister's Transportation Group to truck these tools between the said locations. The damage to the tools reportedly occurred when they were being removed from the truck at the Courier Systems warehouse. It is unclear who exactly was unloading the tools at the warehouse. Subsequent to the incident, these tools were relocated on Jan Packaging, Dover NJ, who the Insured originally hired to package and ship the equipment to China. It is unclear who exactly trucked the tools from Newark NJ to Dover NJ.

We were advised that the remaining eight damaged tools were part of a 30+ truck shipment from Hudson MA (Intel) to Jan Packaging, Dover NJ. These tools were

Itochu Logistics

February 20, 2016
Page 2

loaded and transported by Jan Packaging and their sub-contractor Nolan Transportation Group. It is our understanding that some of the tools were improperly packed / secured in two of the trucks. As a result, these tools sustained a range of impact damage during transit.

INSPECTION / ANALYSIS

We initially met with Mr. Roger Sorhagen, VP of Business Development for Jan Packaging, who informed us of the separate incidents; our interaction with Mr. Sorhagen was limited to a few brief discussions.

Our detailed inspection of each tool was performed jointly with Mr. Haraguchi. We estimate that the tools were manufactured in the 2000 to 2001 timeframe and appear to have been a part of a 200mm wafer fabrication line. Our detailed inspection of each tool identified a wide range of damage. Specifically, we noted what visibly appeared to be cosmetic / minor to severe damage. **ATTACHMENT A**, included herein, lists each of the inspected tools, preliminary findings, and initial thoughts about corrective actions.

Repair Scenario

It is our preliminary opinion that 8 of 10 tools “*technically*” appear repairable. We qualify our opinion using the word “*technically*” because obsolescence of some replacement parts may be an issue based on the age of the tools; albeit, we expect this consideration to be limited.

We must factor in the economic feasibility of repairs. Specifically, our inspection of each tool identified the visible damage to components. However, a major variable we must consider, which translates to additional costs beyond the parts and installation labor, is functional testing of each tool deemed repairable. Regardless of the visible damages that we confirmed, it is essential that each tool be functionally tested. Our inspection identified visible damage only; an equally important issue pertains to unseen damage. Each tool is very sophisticated and delicate, in terms of design and components, respectively. A forceful impact to the tool can relatively easily dislodge and / or damage a component that is not readily visible. Potential damage such as this will not be uncovered until the tool is functionally tested.

An immediate issue regarding functional testing pertains to who exactly has the capability to perform this testing. At this juncture, testing is a major open issue. Additionally, once we identify a potential candidate for testing the tools, it is important that the test cases / protocol be explicitly defined to ensure all involved companies are comfortable with the process. Our immediate thought is possibly engaging the original seller (Intel) to provide insight and / or assistance with testing the tools.

Itochu Logistics

February 20, 2016
Page 3

The confirmation of the full functionality of the tools prior to the event is an important consideration. Specifically, do we know if the tools were fully functional prior to being decommissioned by Intel? Most of the tools had a signoff form secured to them detailing (what appeared to be) decontaminating and disconnecting steps performed by Intel as part of their decommissioning plan. This form appears to indicate that a formal protocol was followed by Intel as a prerequisite prior to moving the tools. However, it does not indicate that the tools were fully functional. It is our opinion that support showing the tools were fully functional prior to the incident is critical. We assume that the buyer (Silan) should have addressed this consideration in advance of purchasing the tools. Thus, we expect that they have documentation detailing this process. We should request these details.

Replacement Scenario

Now that we have explained the major considerations for possibly repairing the tools to a pre-loss condition, it is equally important investigating the economics of repair versus the cost for replacing the tools. The replacement of the tools also presents some issues. Firstly, the existing tools are approximately 15 years old and likely only available on the secondary market (i.e., used, refurbished).

Secondly, some of the damaged tools appear to be part of a larger solution (i.e., including additional tools that were not damaged by the event). Therefore, a compatibility issue may exist if an exact replacement tool is not located. We require understanding the entire production line in order to make this determination. Engaging either Intel or Silan for providing insight about the entire production line(s) will be a crucial requirement for this specific analysis.

We are in the process of research replacement pricing on the secondary market. For example, we were quoted \$138,500 for a refurbished Hitachi S8840 Critical Dimension Scanning Electron Microscope. Having an aggregate RCV for all the tools is important for the comparison against the estimated cost for repairing and testing the tools.

Photographs of the damages are available upon request.

ATTACHMENT A

Tool Inventory and Werlinger & Associates Inspection Analysis
Itochu Logistics: Impact Event (D.O.L.: TBD)

W&A Ref	Make	Model	Part Name / Tool ID	Inventory		Prelim. Disposition	Werlinger & Associates Inspection Analysis	
				Serial No.	Description		Inspection Comment	
1	Tokyo Electron LTD	U2-8555DD	252-OXA30	U01937	200mm Wafer Oxide (Dry) Etcher Tool (Mainframe)	Test / Repair	Physical damage appears to be limited to the side panel doors, hinges, and frame panel in the immediate area. Buckling of doors confirmed, which appeared to result from a futile attempt to lift machine with forklift.	
2	Tokyo Electron LTD	U2-8555DD	252-OXA38	U01642	200mm Wafer Oxide (Dry) Etcher Tool (Mainframe)	Test / Repair	Physical damage to frame panel at corner near side panel doors (opposite of main controller panel side); damage appeared to caused the side panel doors to sag such that they do not close without applying pressure (i.e., the doors slightly overlap at the point where they meet i.e., opposite of door hinges). Additionally, the one of the adjustable legs in proximity to said damage is forcefully bent. It appears that the system may have been unevenly set and / or possibly slightly dropped (based on damage of leg).	
3	Hitachi	S8840 (9120-04)	67-CDA705	NA	Critical Dimension Scanning Electron Microscope (Console)	TBD	Our inspection of other major components (e.g., vacuum process chamber, gas valves, manometer, RF plasma generator, robot controller). However, full functional testing is recommended to ensure an accurate scope of repair is defined and operability is confirmed.	
4	Hitachi	S8840 (9120-04)	67-CDA705	NA	Critical Dimension Scanning Electron Microscope (Mainframe)	Test / Repair	Tool appears to have been struck from the rear where physical damage to enclosure was confirmed. It appears that the tool then was forced into another object that resulted in damage to the keyboard area.	
5	Hitachi / MECS Corp	UTC820Z	67-CDA706	491418A03	Wafer Handler (Transfer unit) Part of Hitachi S8840 SEM solution	Test / Repair	Tool technically appears repairable but considering age, parts availability may be an issue. Additionally, considering the tool experienced a substantial physical impact, we are concerned with the functional integrity of it. Functional testing will be a required step of recovery. Therefore, considering these variables, the economic feasibility of repair is questionable.	

Tool Inventory and Werlinger & Associates Inspection Analysis
Itochu Logistics: Impact Event (D.O.L.: TBD)

W&A Ref	Make	Model	Part Name / Tool ID	Serial No.	Description	Werlinger & Associates Inspection Analysis	
						Prelim. Disposition	Inspection Comment
6	KLA-Tencor	SFS 6220 (5199228)	78-TSB709	1100-457	Wafer defect Inspection System	Replace	Tool appears to have been struck from the rear where physical damage to rear panel was confirmed. It appears that the tool then was forced into another object that resulted in heavy damage to the console (e.g., keyboard, drive) area.
7	Novellus	SABRE-XT	193-CU5704	PA78002401004 (Blurry)	Copper Electrofill tool - ECD (Electrochemical Deposition)	Test / Repair	Considering the tool experienced a substantial physical impact, we are concerned with the functional integrity of it; tool appears to be irreparably damaged. Impact damage to sides and front panels of tool.
8	Neslab Instruments	HX-75 A	CUP704	101128058	Process Chiller Part of Novellus SABRE-XT	Replace	No visible damage found to critical components (e.g., mass flow controllers, He and N2 stainless steel lines / valves, gas sensors). However, full functional testing is recommended to ensure an accurate scope of repair is defined and operability is confirmed.
9	Aviza	Omega	38-DSE701	NA	Etch system Process Chamber	Test / Repair	Visible signs of wetting confirmed on some components (e.g., modular and annealing controllers); it is unclear if this condition is related to the event.
10	Aviza	Omega	38-DSE701	NA	Etch system Process Chamber	Test / Repair	Impact damage to rear of unit appeared to have skewed enclosure (i.e., lift top no longer aligns with main body) No visible damage found to components (i.e., condenser coils / fan, solenoid valves, filter dryer, compressor, circulating pump, exhaust vent motor).
							Unit technically appears repairable; however, it is likely economically infeasible based on design of enclosure (which requires replacement).
							Impact damage to front and side of tool identified; cooling hose fitting bent and pipe clamp (near fluid solenoid valve) skewed on vacuum pump. However, many critical components (e.g., turbo pump controller, module heater controller and distribution box, solenoid controller, solenoid valves, pressure switches) visibly appeared unaffected.
							Tool technically appear repairable. Full functional testing is recommended to ensure an accurate scope of repair is defined and operability is confirmed.
							Impact to rear of tool identified; physical damage to interface ports on what appeared to be the main controller (confirmation of function required) noted. However, all other critical components (e.g., turbo pump controller, module heater controller and distribution box, solenoid controller, solenoid valves, pressure switches) visibly appeared unaffected.
							Tool technically appear repairable. Full functional testing is recommended to ensure an accurate scope of repair is defined and operability is confirmed.